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DDA REGISTRY
FILE: Legal

DDA-81-0849

22 APR 1981

MEMORANDUM FOR: Office of General Counsel, Alien Affairs

FROM: [REDACTED]

Information Handling Systems Architect

SUBJECT: Comments Regarding Analysis of the Paperwork
Reduction Act of 1980REFERENCE: Memorandum from OGC, Alien Affairs, dated
14 April 1981. Subject: Draft Opinion for
Comments, Analysis of the Paperwork Reduction
Act of 1980

1. The Office of the Information Handling Systems Architect (IHSA) has no current procedures to meet the obligations of the subject Act. However, one of the reasons for the establishment of the Office of the IHSA is to assure that the Agency has the centralized capability to perform the duties defined in Section V of the subject memorandum. While most of these are now being done by ODP, it has been recognized that ODP is not properly positioned to perform this centralized management function. Many of the "duties" specified in the Act, now assigned to ODP, will be performed by the IHSA and will be made specific in future directives and regulations. Also, as indicated in [REDACTED] of 11 March 1981, this office will be developing and maintaining summary data relevant to information handling systems. The character of this data is to be determined in the future.

2. It would appear that the requirements of Section 3506(b) of the Act creates a difficult organizational problem. The delegation of authority to the Agency by GSA, relevant to the Brooks Act, pertains to both procurement management and to information handling systems (IHSS) management. As mentioned in the preceding paragraph, the elements of the latter, as defined in the subject memorandum, are now the assigned responsibility of the IHSA.

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3. I believe the procurement management is properly placed, as it is now, with the Director of Logistics. Also, I believe it would be inappropriate to place the IHSs management and the responsibilities defined in 3506(b) with this same individual, since he has neither the professional nor organizational cognizance which relates to those functions. These latter responsibilities should reside with the IHSA. Were the procurement management responsibility placed with the IHSA, I think an important check and balance would be lost. Furthermore, the IHSA does not have professional cognizance in this area.

4. For the aforementioned reasons, my response to your request for comment is that assignment of one office or individual to perform both procurement and IHS architecture management is ill-advised from a management standpoint. It would seem that the delegation of procurement authority, which must be vested in a single individual reporting directly to the DCI, should be delegated to OL and IHSA. The net result would seem to be that the DDA now becomes the designated manager for the delegation of procurement authority, since he reports directly to the DCI and both the D/L and IHSA report to him.

/S/

[Redacted Signature Box]

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[Redacted Date Box]

(22 April 1981)